

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOSEPH JENKINS,

Defendant.

Case No. 5:11-cr-00602-GTS

Notice of Motion

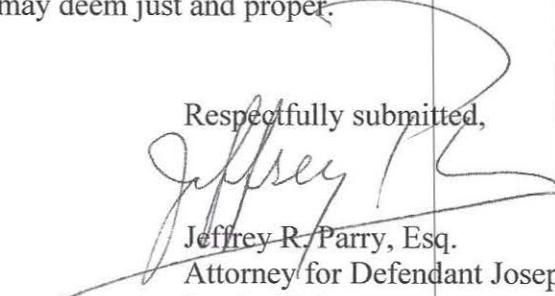
PLEASE TAKE NOTICE, that upon the annexed Affidavit of Jeffrey Parry, Esq., the submitted Memorandum of Law and upon all of the prior pleadings and proceedings heretofore had herein, a Motion will be made as follows;

DATE, TIME AND PLACE OF MOTION: Per the Court's Scheduling Order, motions are returnable August 2, 2012 on submit.

TYPE OF MOTION: Defendant seeks an Order of the Court suppressing the evidence seized or, in the alternative, a hearing to determine same. Defendant further seeks discovery of certain materials which, if not in the possession of the United States Attorney, may be under their immediate control. Additionally, Defendant seeks the suppression of any statements or evidence he may have inadvertently divulged to Canadian officials absent an appropriate *Miranda* warning or otherwise in contradiction to his rights under the United States Constitution. As well, defendant seeks leave to file such other motions as may be appropriate together with such other and further relief as the Court may deem just and proper.

Dated: July 8, 2012

Respectfully submitted,


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